

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

**Joleen K. Youngers, as the Personal
Representative of the Wrongful Death
Estate of Roxsana Hernandez,**

Plaintiff,

v.

C.A. No. 1:20-cv-00465-WJ-JMR

**LaSalle Corrections Transport LLC,
LaSalle Corrections West LLC,
LaSalle Management Company LLC
Global Precision Systems LLC,
TransCor America LLC, CoreCivic, Inc., and
United States of America,**

Defendants,

and

Global Precision Systems, LLC,

Third-Party Plaintiff,

v.

Asset Protection and Security Services, L.P.,

Third-Party Defendant.

STIPULATION BETWEEN PLAINTIFF AND ALL LASALLE DEFENDANTS

Plaintiff and LaSalle Corrections Transport LLC, LaSalle Corrections West LLC, and LaSalle Management Company LLC (collectively hereinafter “LaSalle Defendants”), through their respective attorneys, hereby stipulate and agree that LaSalle Defendants will no longer assert that LaSalle Corrections Transport LLC and LaSalle Corrections West LLC are separate entities for purposes of calculating the number of hours Roxsana was in the LaSalle Defendants’ custody.

Respectfully submitted,

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